

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO**

MELODY JOY CANTU AND DR. RODRIGO
CANTU,

5:20-CV-0746 JKP – HJB

Plaintiffs,

v.

DR. SANDRA GUERRA and DIGITAL
FORENSICS CORPORATION, LLC,

Defendants.

Sixth Continuance Request

Plaintiffs Dr. Rodrigo Cantu and Melody Joy Cantu, in their sixth continuance request, and Co-Defendants Digital Forensics Corporation, LLC (“DFC”) and Dr. Sandra Guerra, through their undersigned attorneys, hereby stipulate:

1. The last filed motion in this matter is Plaintiffs’ Reply in Support of Their Motion to Dismiss Dr. Sandra Guerra’s Amended Counterclaims.
2. The parties are currently going through discovery. Plaintiffs and Defendants have designated experts and are planning to send out discovery requests.
3. On November 4, 2021, DFC retained new counsel, J. David Apple.
4. Mr. Apple has previously reached out to all counsel on this matter, regarding the possibility of continuing discovery deadlines.
5. As the holiday season is upon us, all parties request a continuance for the discovery deadline to have more time to discuss discovery with opposing counsel and provide ample time to review and respond to requests.
6. Plaintiffs’ counsel reached out to opposing counsel for both Co-Defendants and had a good faith conference regarding their request for a continuance.
7. Parties are in agreement to a 60-day continuance. After which, they will reconvene to review whether another continuance is necessary.
8. All parties are in agreement and stipulate to a sixty-day continuance of our discovery deadlines. With the new deadlines as follows:
 - February 14, 2021: Discovery Deadline
 - February 28, 2021: Joint Report on Settlement Negotiations
 - March 13, 2022: Last Day to File Dispositive Motions

Dated: December 14, 2021

Stipulated and respectfully submitted,

/s/ Tor Ekeland

Tor Ekeland (NY Bar No. 4493631)
Pro Hac Vice
Tor Ekeland Law, PLLC
30 Wall Street, 8th Floor
New York, NY
t: (718) 737 - 7264
f: (718) 504 - 5417
tor@torekeland.com

and

/s/ Rain Levy Minns

Rain Minns
State Bar No. 24034581
Minns Law Firm, P.C.
d/b/a Rain Minns Law Firm
4412 Spicewood Springs Rd., Suite 500
Austin, Texas 78759-8583
Tel.: 512-372-3222
Fax: 512-861-2403
rain@rainminnslaw.com

*Counsel for Plaintiffs Melody Joy Cantu and
Dr. Rodrigo Cantu*

Certificate of Service

I certify that on this 14th of December 2021, a true and correct copy of the foregoing was electronically filed with the Clerk of the Court using the CM/ECF system which will send electronic notification of such filing to the parties on record.

/s/ Tor Ekeland